

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 12-17 have been added. Support for these amendments can be found on page 6, lines 6-9. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier. Thus, claims 1-17 are now pending in the application.

Prior Art Rejections:

Claims 1, 2 and 6-11 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,245,656 to Loeb et al. (hereinafter “Loeb”). Claims 3-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Loeb in view of U.S. Patent 5,754,938 to Herz et al. (hereinafter “Herz”). These rejections are traversed for at least the reasons given below.

Claims 1, 2 and 6-11 are rejected under 35 U.S.C. 102(b) as being anticipated by Loeb. Independent claims 1 and 8 both recite a “privacy protection system including a user side device (22) provided with a true user profile which comprises user related profile data” and “a profile generator (24) operable to generate at least one false user profile (26a-26c) which includes profile data not the same as the user’s profile data.” (Independent claim 1; similar language appears in independent claim 8.) The Office Action does not deal with this limitation of “a true user profile which comprises user related profile data.” Rather, the Action details “storing user profile information” as supposedly equivalent to this limitation. However, there is a distinct difference between storing user profile information, and generating a true user profile and false user profiles.

Loeb only teaches providing an end-user identity, for which there is associated an end-user profile. Loeb clearly distinguishes between the end-user identity and the end-user profile, asserting that at most, any one entity only knows “either the identity of the end-user or the contents of the end-user profile.” (column 2, lines 8-11) Loeb teaches that a false identity of the end-user, NOT a false end-user profile, is generated. Loeb states that if “there is no profile information which needs to be transmitted, the end-user transmits only the actual

identity U to the name translator station 30.” (column 4, lines 16-19) This means that the profile information of the user is separate from the identity, and it is only the identity information of the user that is translated. Specifically, Loeb asserts that the “end-user station transmits its actual identity u via the network 12 to its name translator station 30.” (column 4, lines 8-9) “The name translator station 30 translates the actual identity U to the pseudonym U’, which pseudonym is known to the service provider station 20 and filter station 40.” (column 4, lines 19-22)

If any profile information is sent to the name translator station, it is encrypted, but not translated. It is known that [Pr] is only encrypted and not translated because Loeb asserts that an extra layer of encryption is provided such that if the layer were not provided, one might be able to correlate U and U’ based on the profile information [Pr] (column 4, lines 9-15 and 24-35). Further, the name of this station alone, “name translator station” conveys that it is limited to translate names or identities of users. Thus, it is clear that Loeb fails to teach generating the true and false user profiles of the invention as claimed. If this rejection is maintained, the Office is respectfully requested to point out where these features are found in Loeb.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a whole. As mentioned above, Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

Claims 3-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Loeb in view of Herz. Herz fails to make up for the deficiencies of Loeb as detailed above. Herz may teach partial profiles, but a partial profile is in no way equivalent to a false profile. A partial profile may omit information, but a false profile is defined in the independent claims as including “profile data not the same as the user’s profile data.” (Independent claim 1, similar language appears in independent claim 8.) Thus, Herz also fails to teach a “privacy protection system including a user side device (22) provided with a true user profile which comprises user related profile data” and “a profile generator (24) operable to generate at least one false

user profile (26a-26c) which includes profile data not the same as the user's profile data.” If this rejection is maintained, the Office is respectfully requested to point out where these features are found in Herz or Loeb.

With regards to new claims 12-17, neither Loeb nor Herz teaches the added features of these claims. Claims 12 and 15 recite the feature that the “transmission means are operable to transmit a plurality of false user profiles to a third party (14-18) with a data request.” The Office interprets the pseudonym u’ to be the false user profile of Loeb. Even if this interpretation were correct, there is no teaching or suggestion that more than one pseudonym is utilized in Loeb. In fact, it would be counter to Loeb’s teachings to utilize more than one pseudonym for one actual user identity because only the name translator creates and knows the association between the actual user identity and the pseudonym (column 6, lines 8-9). It would not make sense for the name translator to make more than one pseudonym for a name because it is the only entity that utilizes both the pseudonym and the actual user identity. Herz does not make up for the deficiencies of Loeb as shown above, because Herz does not teach false profiles.

Claims 13 and 16 recite a privacy protection system (and method) “wherein the false user profile contains at least one item of user identification data and at least one other item of user data.” There is no teaching or suggestion in Loeb that the pseudonym contains any information other than a translation of the user identity. In fact, as mentioned above, the user identity and the user profile of Loeb are two distinct entities. Herz does not make up for the deficiencies of Loeb as shown above, because Herz does not teach false profiles.

Claims 14 and 17 recite a privacy protection system (and method) “wherein the false user profile contains at least one item of data from the true user profile corresponding to a user field and at least one item of false data corresponding to a different user field.” As mentioned above, there is no teaching or suggestion in Loeb that the pseudonym contains any information other than a translation of the user identity. Further, there is no indication that even if more than one item of information were stored in the false user profile, that at least one item of data would be factual, and at least one item of data would be false. There is no suggestion or teaching in Loeb that the pseudonym would hold factual information. In fact,

this would contrast with the teachings of Loeb, which utilize a pseudonym in order to mask the true user identity. Herz does not make up for the deficiencies of Loeb as shown above, because Herz does not teach false profiles in the first place.

Thus, claims 12-17 are also novel over the cited prior art. As mentioned above, Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

Conclusion:

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 C.F.R. § 1.25. Additionally, charge any fees to Deposit Account 08-2025 under 37 C.F.R. § 1.16 through § 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

Respectfully submitted,

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